

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

Charlette D. Lachney, Martha
Berthelot *et al.* and Ethel L. Robinson,
Plaintiffs,

v.

Target Corporation,
Defendant.

CIV-06-1389-HE
(Consolidated Cases)

Michael M. Maiahy,
Plaintiff,

v.

Target Corporation,
Defendant.

CIV-03-1685-HE
(Consolidated for Discovery)

Jamal K. Merchant,
Plaintiff,

v.

Target Corporation,
Defendant.

CIV-04-1659-HE
(Consolidated for Discovery)

Tet V. Fields,
Plaintiff,

v.

Target Corporation,
Defendant.

CIV-05-0021-HE
(Consolidated for Discovery)

_____)	
Cindy Sioux,)	
)	
Plaintiff,)	
)	
v.)	CIV-05-0300-HE
)	(Consolidated for Discovery)
)	
Target Corporation,)	
)	
Defendant.)	
_____)	
Linda Bizzell,)	
)	
Plaintiff,)	
)	
v.)	CIV-05-0829-HE
)	(Consolidated for Discovery)
)	
Target Corporation,)	
)	
Defendant.)	
_____)	

DEFENDANT’S DESIGNATION OF EXPERT WITNESS

Defendant Target Corporation (“Target”) hereby designates the following expert witness in all of the above-captioned cases:

1. Mary Dunn Baker, Ph.D., ERS Group, 4901 Tower Court, Tallahassee, Florida 32303, (850) 562-1211. Dr. Baker will testify in accordance with her July 2008 reports (and December 2004 report, previously produced, where applicable) and will provide information relating to statistical analyses of employment terminations relating to plaintiffs’ claims of age discrimination, as well as rebuttal to the expert reports filed by plaintiffs. Copies of her 2008 expert reports, curriculum vitae and previous trial/case experience have been provided to counsel for plaintiffs on this date. Since discovery is not completed, Dr. Baker reserves the right to supplement her reports based on

information acquired after her reports.

Respectfully submitted,

s/ David T. Wiley

Thomas A. Davis

davist@jacksonlewis.com

David T. Wiley

wileyd@jacksonlewis.com

Shannon L. Miller

millers@jacksonlewis.com

JACKSON LEWIS LLP

First Commercial Bank Building

800 Shades Creek Parkway, Ste. 870

Birmingham, Alabama 35209

Ph: (205) 332-3101/3102/3104

Fax: (205) 332-3131

Attorneys for Defendant Target Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this the 16th day of July, 2008, a true and correct copy of the foregoing has been electronically served via the CM/ECF upon the following counsel of record:

Jim T. Priest, Esq.
Timothy D. Eisel, Esq.
Whitten Burrage Priest Fulmer Anderson & Eisel
One Leadership Square, Ste. 1350
Oklahoma City, OK 73102
jpriest@whittenburragelaw.com
teisel@whittenburragelaw.com

Jana B. Leonard, Esq.
LEONARD & ASSOCIATES, P.L.L.C.
8265 S. Walker
Oklahoma City, OK 73139
leonardjb@leonardlaw.net

s/David T. Wiley

Counsel of Record